

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	No. <u>3:22-cr-00327</u>
v.	)	
	)	
	)	
CHESTER GALLAGHER,	)	
HEATHER IDONI,	)	
CALVIN ZASTROW,	)	
COLEMAN BOYD,	)	
CAROLINE DAVIS,	)	
PAUL VAUGHN,	)	
DENNIS GREEN,	)	
EVA EDL,	)	
EVA ZASTROW,	)	
JAMES ZASTROW,	)	
PAUL PLACE.	)	

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 83.01 of the Local Rules of Court for the United States District Court Middle District of Tennessee, Sanjay Patel hereby moves for admission to appear *pro hac vice* in the above-captioned action for Plaintiff United States of America.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. I am a member in good standing of the bar of the United States District Court for the Northern District of Illinois. Attached is a Certificate of Good Standing from that Court.
2. I am not, nor have I ever been, the subject of disciplinary proceedings by any disciplinary authority, court, or tribunal.
3. I have not been found in contempt by any court or tribunal.

4. I have not been sanctioned pursuant to 28 U.S.C. § 1927.
5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court or tribunal.
6. I have not been charged, arrested, or convicted of a criminal offense or offenses.
7. I understand that pursuant to Local Rule 83.01(d)(1), if I am not both a member of the Tennessee bar and admitted to the bar of this Court, local counsel must be retained. Local counsel has been retained in this matter as follows: Amanda Klopf, Assistant United States Attorney, United States Attorney's Office for the Middle District of Tennessee, 719 Church Street, Suite 3300, Nashville, TN 37203, phone number (615) 736-5151 and email address is: [Amanda.Klopf@usdoj.gov](mailto:Amanda.Klopf@usdoj.gov).
8. I have read and am familiar with Local Rules of Court for the United States District Court Middle District of Tennessee.
9. By seeking admission to practice before this Court, I acknowledge my responsibility for compliance with all rules of this Court and confer disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of the proceeding.

Respectfully submitted,

/s/ Sanjay Patel  
SANJAY PATEL  
State of Illinois Bar No. 6272840  
Trial Attorney  
Criminal Section  
Civil Rights Division  
U.S. Department of Justice  
4 Constitution Square  
150 M St., NE – 7.121  
Washington, DC 20530  
Phone: (202) 598-9627  
Email: sanjay.patel@usdoj.gov

MARK WILDASIN  
United States Attorney  
Middle District of Tennessee

By: /s/ Amanda Klopf  
AMANDA KLOPF  
Assistant United States Attorney  
719 Church Street, Suite 3300  
Nashville, TN 37203  
(615) 736-5151  
Email: [Amanda.Klopf@usdoj.gov](mailto:Amanda.Klopf@usdoj.gov)

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Motion For Admission *Pro Hac Vice* was electronically filed with the Clerk on October 12, 2022, and service was made upon all persons registered in that case via CM/ECF and/or by email.

/s/Amanda Klopf  
AMANDA KLOPF  
Assistant United States Attorney